

March 15, 2022

The Honorable Jocelyn G. Boyd
Chief Clerk/Executive Director
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, SC 29210

Via SCPSC E-FILING DMS

**Re: Dominion Energy South Carolina, Incorporated's 2022 Annual Update on
Demand Side Management Programs and Petition to Updated Rider;
Docket No. 2022-52-E**

Dear Ms. Boyd:

Please find attached for electronic filing with the South Carolina Public Service Commission ("Commission") a copy of the Petition to Intervene of Walmart Inc. ("Walmart"), in the above-referenced case. By copy of this letter, I am serving all parties of record via Electronic Mail.

Please contact us if you have any questions concerning this filing.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By



Stephanie U. Eaton (SC Bar No. 80073)

Derrick Price Williamson
Spilman Thomas & Battle, PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com

Counsel to Walmart Inc.

SUE/sds
Attachments
c: Certificate of Service

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2022-52-E

IN RE:)	PETITION TO INTERVENE OF
)	WALMART INC.
Dominion Energy South Carolina,)	
Incorporated's 2022 Annual Update on)	
Demand Side Management Programs and)	
Petition to Updated Rider)	

I hereby certify that I have this day served one (1) copy of the foregoing document upon the following parties to this proceeding via Electronic Mail:

K. Chad Burgess, Esquire
Matthew W. Gissdendanner, Esquire
Dominion Energy South Carolina, Inc.
Mail Code C222
220 Operation Way
Cayce, SC 29033
chad.burgess@dominionenergy.com
matthew.gissdanner@dominionenergy.com

Nicole M. Hair, Esquire
Christopher M. Huber, Esquire
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
nhair@ors.sc.gov
chuber@ors.sc.gov

Carri Grube-Lybarker, Esquire
Roger P. Hall, Esquire
SC Department of Consumer Affairs
293 Greystone Boulevard, Suite 400
Columbia, SC 29210
clybarker@scconsumer.gov
rhall@scconsumer.gov

Emily W. Medlyn, Esquire
U.S. Army Legal Services Agency
Regulatory Law Office (JALS-ELD)
9275 Gunston Road
Fort Belvoir, VA 22060-4446
Emily.w.medlyn.civ@army.mil



Stephanie U. Eaton (SC Bar No. 80073)

Dated: March 15, 2022

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2022-52-E

IN RE:)	PETITION TO INTERVENE OF
)	WALMART INC.
Dominion Energy South Carolina,)	
Incorporated's 2022 Annual Update on)	
Demand Side Management Programs and)	
Petition to Updated Rider)	

Pursuant to Rule 103-825 of the rules and regulations of the South Carolina Public Service Commission ("Commission"), Walmart Inc. ("Walmart"), by its attorneys, respectfully requests that the Commission permit it to intervene and become a party in the above-captioned matter. In support of its Petition to Intervene, Walmart submits as follows:

1. On January 31, 2022, Dominion Energy South Carolina, Inc. ("DESC") filed an Annual Update on Demand Side Management ("DSM") Programs and Petition to Update Rider ("Petition"). The Petition was filed pursuant to S.C. Code Ann. Section 58-37-20 (2015), S.C. Code Ann. Regs. 103-819 and 103-825 (2012), the Rules of Practice and Procedure of the Public Service Commission of South Carolina, and all other applicable law and rules.

2. Walmart is a global retailer of goods and services and also operates throughout the United States. Walmart's principal energy management office is located at 2608 SE J Street, Bentonville, Arkansas 72716.

3. Walmart has the privilege of providing its retail services in the State of South Carolina. Walmart is a large commercial customer of DESC, operating approximately 34 retail stores and related facilities within the DESC service area. Collectively, these facilities consume over 122 million kWh annually. Electricity is one of the largest operating costs faced by Walmart.

As a result, any modification to DESC's electric rates and terms of service has the potential to substantially impact Walmart's operations in South Carolina. Further, Walmart is dedicated to its own investment in DSM and energy efficiency ("EE") and therefore is very interested in this case and has participated in similar cases in the past. As such, Walmart has a direct and substantial interest in the outcome of this proceeding. In addition, as a large commercial customer that purchases substantial amounts of electric and related services from DESC pursuant to multiple accounts at multiple locations, Walmart has an interest in this proceeding that is not represented by any other party.

4. The attorneys representing Walmart in this proceeding are:

Stephanie U. Eaton
Spilman Thomas & Battle, PLLC
110 Oakwood Drive, Suite 500
Winston-Salem, NC
Phone: (336) 631-1062
Fax: (336) 725-4476
E-mail: seaton@spilmanlaw.com

Derrick Price Williamson
Spilman Thomas & Battle, PLLC
1100 Bent Creek Blvd., Suite 101
Mechanicsburg, PA 17050
Phone: (717) 795-2740
Fax: (717) 795-2743
E-mail: dwilliamson@spilmanlaw.com

Ms. Eaton is authorized to accept service of papers in this proceeding on behalf of Walmart. Walmart also respectfully requests that Mr. Williamson be added to the service list. Walmart may cause to be filed a motion for Mr. Williamson to be admitted *pro hac vice* before this Commission, and subsequent to any Commission grant of such request, Walmart requests that Mr. Williamson be added to the official service list as an attorney authorized to accept service of papers in this proceeding.

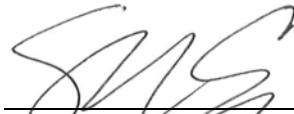
5. This Petition to Intervene is timely filed as interventions are due by April 11, 2022, per Notice of the Commission.

WHEREFORE, Walmart respectfully requests that it be granted leave to intervene and be made a party to the above-captioned proceeding.

Respectfully submitted,

SPILMAN THOMAS & BATTLE, PLLC

By



Stephanie U. Eaton (SC Bar No. 80073)

110 Oakwood Drive, Suite 500

Winston-Salem, NC 27103

Phone: (336) 631-1062

Fax: (336) 725-4476

E-mail: seaton@spilmanlaw.com

Derrick Price Williamson

1100 Bent Creek Blvd., Suite 101

Mechanicsburg, PA 17050

Phone: (717) 795-2740

Fax: (717) 795-2743

E-mail: dwilliamson@spilmanlaw.com

Counsel to Walmart Inc.

Dated: March 15, 2022